

REMARKS

In the Office Action dated July 21, 2004, the Examiner rejected claims 1-5 and 7-42 and objected to claim 6, indicating that it would be allowable if the limitations of its independent claim and the intervening claim were included in the claim.

Applicant has amended Claim 6 as suggested by the Examiner.

Applicant has canceled Claim 7.

Applicant submits that the Claims 8, 29, and 38 contained allowable subject matter as the claims were originally presented. Applicant respectfully disagrees with the Examiner's rejection of Claims 8, 29 and 38 because none of the cited references discloses or teaches anything about classification of the floating drilling rig component nor does it teach anything about seeking classification for the converted vessel. Applicant has amended Claims 8, 29 and 38 to place them in independent form. Applicant is not amending the claims to define over the cited prior art and has included in the amended claims only limitations of their respective independent claims as originally submitted. Applicant requests allowance of the Claims 8, 29, and 38.

Applicant has amended independent Claims 1 and 23 to define over the cited WO 84/02151 reference. The WO reference does not disclose or teach affixing the floating drilling rig component to a support barge component in an assembly location to form a single converted vessel capable of being transported to a drilling location remote from the assembly location. Indeed, the reference teaches away from this limitation. The reference discloses construction of the components remote from the intended artic drilling location and towing the components to "an assembly location selected as closely adjacent to the site of intended use as possible." (WO 84/02151, p. 19, lines 16-19). Therefore, not only is the claimed invention not anticipated by the WO reference, it is not obvious in view of the reference. Applicant requests allowance of Claims 1 and 23 as amended

Applicant has amended Claim 34 to define over the WO reference and the Templeton reference. The WO reference does not disclose or teach a composite vessel capable of being transported to a drilling location remote from the assembly location. Indeed, as discussed above, the WO reference teaches away from this limitation. The Templeton reference does not disclose

Applicant : Gene Facey, et al
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or teach a composite vessel having a first component that comprises a floating drilling rig that was originally constructed and configured for performing drilling operations while floating. Therefore, Claim 34 as amended defines over the Templeton cited reference. Applicant requests allowance of Claim 34.

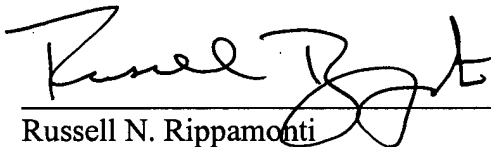
The remaining claims are dependent from an allowable independent claim and incorporate the limitations of their independent claims. The dependent claims are allowable for the same reasons heretofore discussed with respect to the independent claims.

Enclosed is a check in the amount of \$352.00 for the amendment of 4 dependent claims to independent claims. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: _____

10/12/04



Russell N. Rippamonti
Reg. No. 39,521

Fish & Richardson P.C.
5000 Bank One Center
1717 Main Street
Dallas, Texas 75201
Telephone: (214) 292-4031
Facsimile: (214) 747-2091